

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI

“LILY,” “SARAH,” PIKES PEAK
PROBATE SERVICES as Conservator for
“SIERRA,” “SOLOMON,” “HENLEY,”
WILLIAM L.E DUSSAULT as Guardian ad
Litem for “VIOLET,” a minor, JANE ROE, as
next of friend for “PIA,” a minor, “JENNY”,
and ‘FIONA.”

Plaintiffs,

v.

MICHAEL MILLIMAN,

Defendant.

Case No:

Jury Trial Demanded

**DECLARATION OF DEBORAH A. BIANCO IN SUPPORT OF
PLAINTIFFS' MOTION TO PROCEED UNDER PSEUDONYMS**

I, DEBORAH A. BIANCO, hereby declare the following to be true and correct under penalty of perjury of the laws of the State of Washington:

1. I make this declaration in support of Plaintiffs' motion to proceed in this matter using pseudonyms.
2. I represent the Plaintiffs “Henley” of the BluePillow1 Series of child pornography and “Pia” of the Sweet White Sugar Series of child pornography.
3. Each of the plaintiffs were sexually exploited when they were minor children. Images of Plaintiffs' sexual abuse are circulated and traded on the internet by pedophiles, such as the defendant, who was convicted of child pornography crimes, and who, possessed images of Pia and Maureen.
4. Henley and Pia are each victims of multiple child pornography offenses

committed in multiple states around the country.

5. I have represented Pia since 2016 and Henley since 2019. I have submitted requests for restitution in state and federal criminal courts in many jurisdictions on Pia's and Henley's behalf. In each of these requests, a pseudonym has been used in order to protect the anonymity of the victims of child pornography crimes.

6. I also represent 18 other victims of child pornography, for whom I regularly submit restitution requests to courts throughout the United States. No court, including the U.S. Supreme Court, has yet ordered that any of these victims use his or her legal name in any court proceeding.

7. Pia and Henley are each real individuals whom I have personally met. Jane Roe is Pia's mother and revealing Jane Roe's legal name would lead to identification of Pia and also the family's location. Pia and Henley have significant psychological injuries resulting from the child pornography related crimes of which they are victims. Like other victims of these crimes, these young women fear the prospect of the consumers of the images of their sexual abuse seeking them out and attempting to initiate contact with them or sexually assault them. Henley is an adult and Pia is a minor. Each of these victims of image exploitation crimes lives in fear of unwanted contact from someone who has seen their images. Each believes that exposing their legal names to the public record puts them in physical danger and would compound the emotional harms that they suffer.

8. Henley and Pia have been in counseling to try to recover from the emotional problems they have because of the image exploitation crimes against them. It is going to take each of them many years of counseling to cope with the harms that she has suffered, and which she continues to suffer as a result of the ongoing circulation of the images of her abuse.

9. Henley and Pia are very afraid to have their legal names linked with the fact they are child pornography victims or to allow any information about their identities to be publicly revealed, where they live, or other information that might enable predators to locate them.

10. Plaintiffs request permission to use pseudonyms herein in order to protect their clients from harassment, injury, ridicule and personal embarrassment.

DATED this 22nd day of December, 2022, at Bellevue, Washington.

DEBORAH A. BIANCO, PS

By /s Deborah A. Bianco
Deborah A. Bianco, WSBA No. 19826
PO Box 6503
Bellevue, Washington 98008
Phone: 425-747-4500
Email: bianco.lawyers@gmail.com
Of Attorneys for Plaintiffs Jane Roe, Pia and Henley